



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

July 20, 2023

By ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records v. United States Citizenship and Immigration Services*,
23 Civ. 1997 (PAE)

Dear Judge Engelmayer:

This Office represents United States Citizenship and Immigration Services (“Government”), defendant in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). With plaintiffs’ consent, we write respectfully to request a 30-day extension of time to file the Government’s response to the complaint, currently due July 26. If the Court were to grant this request, the Government’s response would be due August 25. The reason for this request is that the parties continue to negotiate a possible resolution of the Plaintiffs’ “policy and practice” claim, as well as a possible resolution of the processing of the FOIA requests at issue in this action. Additional time is necessary for the parties to determine whether they will be able to resolve these issues, which in turn will help the Government decide how to respond to the complaint, and in particular whether the parties will need to engage in motion practice over the “policy and practice” claim.

This is the Government’s third request for an extension. *See* ECF No. 8. The Court granted the prior two requests. *See* ECF No. 9, 12.

This request does not affect any other scheduled dates, nor does it affect the agency’s ongoing processing of plaintiff’s FOIA requests.

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney
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